

FILED

AO 106 (REV 4/10) Affidavit for Search Warrant

AUSA G. David Rojas, (312) 886-5966

APR 10 2019

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION
 Magistrate Judge Sidney I. Schenkier
 United States District Court

In the Matter of the Search of:

Case Number:

19M238

the USPS Priority Mail package bearing tracking
 number 9505 5158 1377 9098 2754 99, further
 described in Attachment A

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Vincent Humphrey, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and
 state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

*Code Section**Offense Description*

Title 21, United States Code, Section 843(b)

Narcotics

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.


 Applicant's Signature

VINCENT HUMPHREY, Postal Inspector, U.S. Postal
 Inspection Service

Printed name and title

Sworn to before me and signed in my presence.

Date: April 10, 2019


 Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Vincent Humphrey, being duly sworn, state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service. I have been so employed since approximately February 2017.

2. As part of my duties as a USPS Postal Inspector, I investigate criminal violations of the federal laws relating to the mails and to controlled substances.

3. This affidavit is made in support of an application for a warrant to search the USPS Priority Mail Parcel with Tracking Number 9505 5158 1377 9098 2754 99 described further in Attachment A (the “**Subject Parcel**”), for evidence, instrumentalities, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Section 843(b).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL

5. On April 10, 2019, law enforcement inspected the **Subject Parcel** at USPS Chicago Bulk Mail Center in Forest Park, Illinois. The **Subject Parcel** was mailed on April 8, 2019, from Newport Beach, California, 92658 and is addressed to “Daunelle Bzami, 9151 Sunrise Ln Orland Park, IL 60462,” with a return address of “Lateef Abdulrahm, 104 Corsica Dr, Newport Beach, CA 92660.” The **Subject Parcel** bears \$84.55 in postage, measures approximately 17 inches by 17 inches by 16 inches, and weighs approximately 35 pounds and 8 ounces.

6. Law enforcement observed characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. Law enforcement ran the sender and recipient names and addresses on the **Subject Parcel** through a law enforcement database. According to the database, the purported return address exists, but the purported sender is not associated with the listed address. In addition, there is no “Daunelle Bzami” associated with the recipient address, though there are individuals with the same surname or given name associated with the address. Based on my training and experience, fictitious sender or recipient names can indicate that the sender or recipient does not want to be associated with the parcel.

8. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on an officer’s training and experience,

however, the combination of these characteristics led the officer to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

9. On April 10, 2019, law enforcement arranged for a United States Customs and Border Protection Canine Officer and his canine partner, "Hannah," to meet with an officer and examine the **Subject Parcel**. According to the Canine Officer, Hannah is certified annually by United States Customs and Border Protection as a narcotics dog. Hannah was most recently re-certified on September 6, 2018. Hannah is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Hannah is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Hannah has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 164 occasions since December 2014, with a success rate of approximately 89%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

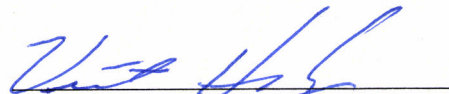
10. On April 10, 2019, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, law enforcement arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 10 other parcels in the workroom area. Law enforcement then witnessed Hannah examine the parcels

and observed Hannah alert by sitting next to the **Subject Parcel**. Hannah did not alert to any of the other parcels. The Canine Officer informed law enforcement that Hannah's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcel**. Law enforcement then took custody of the **Subject Parcel**.

II. CONCLUSION

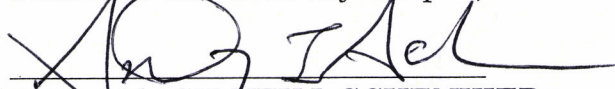
11. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcel**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.



Vincent Humphrey
Postal Inspector
U.S. Postal Inspection Service

Subscribed and sworn
before me this 10th day of April, 2019



Honorable SIDNEY I. SCHENKIER
United States Magistrate Judge

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The USPS Priority Mail Parcel bearing tracking number "9505 5158 1377 9098 2754 99," a recipient address of "Daunelle Bzami, 9151 Sunrise Ln Orland Park, IL 60462," and a return address of "Lateef Abdulrahm, 104 Corsica Dr, Newport Beach, CA 92660." The parcel measures approximately 17 inches by 17 inches by 16 inches, weighs approximately 35 pounds and 8 ounces, and bears \$84.55 in postage.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities, and contraband concerning violation of Title 21, United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States currency;
4. Items associated with controlled substances;
5. Items that identify the sender or receiver of the parcel; and
6. Any other items that are contained inside of the parcel that could be examined for evidence, such as latent fingerprints, of who has accessed the inside of the parcel or handled its contents.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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number 9505 5158 1377 9098 2754 99, further
described in Attachment A

SEARCH AND SEIZURE WARRANT

To: Vincent Humphrey and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of
the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person
or property described above, and that such search will reveal:

See Attachment B

YOU ARE HEREBY COMMANDED to execute this warrant on or before April 24, 2019 in the daytime (6:00
a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an
inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate
Judge.

Date and time issued: April 10, 2019 4:20 PM


Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge
Printed name and title

Return

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

*Executing officer's signature*_____
Printed name and title

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